17. For an application involving an auxiliary facility only, attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. N/A

(a) the proposed auxiliary 1 mV/m contour; and

(b) the 1 mV/m contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license. See 47 C.F.R. Section 73.1675. (File No.:_____)

18. Terrain and coverage data *(to be calculated in accordance with 47 C.F.R. Section 73.313).*

Source of terrain data: *(check only one box below)*

[XX] Linearly interpolated 30-second database [ ] 7.5 minute topographic map

(Source: Dataworld)

[ ] Other *(briefly summarize)*

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances to the 1 mV/m contour (kilometers)
0	See 3rd page of Exhibit F-1.	
45		
90		
135		
180		
225		
270		
315		

Allocation Studies

(See Subpart C of 47 C.F.R. Part 73)

19. Is the proposed antenna location within 320 kilometers (199 miles) of the common border between the United States and Mexico? [ ] Yes [XX] No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Agreement between the United States of America and the United Mexican States concerning Frequency Modulation Broadcasting in the 88 to 108 MHz band.

Exhibit No.

20. Is the proposed antenna location within 320 kilometers of the common border between the United States and Canada? ☐ Yes ☒ No

If Yes, attach as an Exhibit a showing of compliance with all provisions of the Working Agreement for Allocation of FM Broadcasting Stations on Channels 201-300 under The Canada-United States FM Agreement of 1947. Exhibit No.

21. If the proposed operation is for a channel in the range from channel 201 through 220 (88.1 through 91.9 MHz), or if this proposed operation is for a class D station in the range from Channel 221 through 300 (92.1 through 107.9 MHz), attach as an Exhibit a complete allocation study to establish the lack of prohibited overlap of contours with other U.S. stations. The allocation study should include the following: Exhibit No. F

(a) The normally protected interference-free and the interfering contours for the proposed operation along all azimuths.
(b) Complete normally protected interference-free contours of all other proposals and existing stations to which objectionable interference would be caused.
(c) Interfering contours over pertinent arcs of all other proposals and existing stations from which objectionable interference would be received.
(d) Normally protected and interfering contours over pertinent arcs, of all other proposals and existing stations, which require study to show the absence of objectionable interference.
(e) Plot of the transmitter location of each station or proposal requiring investigation, with identifying call letters, file numbers and operating or proposed facilities.
(f) When necessary to show more detail, an additional allocation study will be attached utilizing a map with a larger scale to clearly show interference or absence thereof.
(g) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire Exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
(h) The name of the map(s) used in the Exhibit(s).

22. With regard to any stations separated by 53 or 54 channels (10.6 or 10.8 MHz) attach as an Exhibit information required in 1/ *(separation requirements involving intermediate frequency (i.f.) interference).* Exhibit No. F

Nearest IF consideration is WEZO (CP), BMPH-880920IG, which is 28.8 km distant. Only 20 km required. See Exhibit F-1

23.(a) Is the proposed operation on Channel 218, 219, or 220? ☐ Yes ☒ No

(b) If the answer to (a) is yes, does the proposed operation satisfy the requirements of 47 C.F.R. Section 73.207? ☐ Yes ☐ No

(c) If the answer to (b) is yes, attach as an Exhibit information required in 1/ regarding separation requirements with respect to stations on Channels 221, 222 and 223. Exhibit No.

(d) If the answer to (b) is no, attach as an Exhibit a statement describing the short spacing(s) and how it or they arose. Exhibit No.

1/ A showing that the proposed operation meets the minimum distance separation requirements. Include existing stations, proposed stations, and cities which appear in the Table of Allotments; the location and geographic coordinates of each antenna, proposed antenna or reference point, as appropriate; and distance to each from proposed antenna location.

(e) If authorization pursuant to 47 C.F.R. Section 73.215 is requested, attach as an Exhibit a complete engineering study to establish the lack of prohibited overlap of contours involving affected stations. The engineering study must include the following:

Exhibit No. N/A

(1) Protected and interfering contours, in all directions (360°), for the proposed operation.
(2) Protected and interfering contours, over pertinent arcs, of all short-spaced assignments, applications and allotments, including a plot showing each transmitter location, with identifying call letters or file numbers, and indication of whether facility is operating or proposed. For vacant allotments, use the reference coordinates as transmitter location.
(3) When necessary to show more detail, an additional allocation study utilizing a map with a larger scale to clearly show prohibited overlap will not occur.
(4) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
(5) The official title(s) of the map(s) used in the exhibits(s).

24. Is the proposed station for a channel in the range from Channel 201 to 220 (88.1 through 91.9 MHz) and the proposed antenna location within the distance to an affected TV Channel 6 station(s) as defined in 47 C.F.R. Section 73.525?

[XX] Yes [ ] No

If Yes, attach as an Exhibit either a TV Channel 6 agreement letter dated and signed by both parties or a map and an engineering statement with calculations demonstrating compliance with 47 C.F.R. Section 73.525 for each affected TV Channel 6 station.

Exhibit No. A

Proposed facility will be diplexed on WCPX-TV antenna per FCC Part 73.252(d). See Exhibit A, Engineering STmt.

25. Is the proposed station for a channel in the range from Channel 221 to 300 (92.1-107.9 MHz)?

[ ] Yes [XX] No

If Yes, attach as an Exhibit information required in 1/. *(Except for Class D (secondary) proposals.)*

Exhibit No.

26. Environmental Statement *(See 47 C.F.R. Section 1.1301 et seq.)*

Would a Commission grant of this application come within Section 1.1307 of the FCC Rules, such that it may have a significant environmental impact?

[ ] Yes [XX] No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 1.1311.

Exhibit No.

If No, explain briefly why not.

No physical changes to structure are proposed.

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name *(Typed or Printed)*	Relationship to Applicant *(e.g., Consulting Engineer)*
Glen Clark, P.E.	Consulting Engineer
Signature	Address *(Include ZIP Code)*
	1150 Alpha Drive Suite 150 Alpharetta, GA 30201-7168
Date	Telephone No. *(Include Area Code)*
24 JUL 90	(404) 740-0178

EXHIBIT A

ENGINEERING STATEMENT

CENTRAL FLORIDA EDUCATIONAL FOUNDATION INC.

The following material has been prepared on behalf of the Central Florida Educational Foundation, Inc. (CENTRAL FLORIDA). Central Florida presently has on file, an Application for a non-commercial, FM, broadcast station at Union Park, FL. (BPED-881207MA) The instant Application seeks to modify that Application by increasing the antenna height, decreasing Effective Radiated Power and specifying horizontal-only polarization.

The outstanding Application proposed an antenna which would be sidemounted on the WCPX-TV tower at the 173 M (AG) level. WCPX-TV operates on Channel 6. The co-location was proposed in accordance with Part 73.525(d) of the FCC's Rules, in an effort to eliminate harmful interference between the proposed FM and the existing Channel 6 facility.

Through additional negotiations with WCPX, it has been agreed that the proposed FM will be diplexed with the WCPX signal at the base of the tower and will be fed to the existing WCPX antenna. This will provide an exact match between the vertical radiation patterns of the FM and TV signals, providing for the minimum possible viewer interference. The instant Application reflects those changes.

The WCPX antenna transmits horizontally-polarized only. Therefore, the proposed FM signal will also have only horizontal polarization.

The WCPX antenna is also slightly directional, providing protection to WCIX(TV) [Channel 6, Miami]. The proposed FM pattern will then also be slightly directional, not because it is required by the allocation situation, but simply because that is the nature of the antenna on which it will be diplexed.

The horizontal radiation pattern of the WCPX antenna is shown as Exhibit D. While it is recognized that this pattern was measured at Channel 6, for the reasons below, the pattern is also valid at the proposed frequency (88.3 MHz).

Television antennas are, by nature, broadband, both in regard to frequency and in regard to pattern shape. The WCPX antenna is an RCA TBF-6AM ("Butterfly Panel") antenna. Panel antennas, because each face of the tower has its own radiating element, produce horizontal radiation patterns which change little with shifts in frequency.

EXHIBIT A

ENGINEERING STATEMENT

(CONTINUED)

The WCPX antenna consists of three faces, one on each side of the triangular tower. Each face is six panels high and is fed from the ground by a separate transmission line. The slight directionality of the antenna is created by an unequal power division. The present power divider produces the following division: 36.25%, 36.25%, 27.5%.

Additional technical detail regarding the WCPX antenna is contained in the August 1970 filing "APPLICATION FOR CONSTRUCTION PERMIT TO MAKE MINOR CHANGES IN DIRECTIONAL RADIATION PATTERN". [At that time, the Channel 6 call sign was WDBO-TV.]

Because of this directionality, and the fact that Central Florida's previous proposal employed a non-directional antenna, one will notice that the before and after 60 dBu contours in the "Minor Change Showing" (Exhibit G) are not perfectly concentric. While they have the same origin, the instant contour bulges slightly to the west and is flattened slightly to the south.

ORGANIZATION OF THE INSTANT APPLICATION

As the proposed facility will transmit from an existing tower whose co-ordinates are well established, no site map is included. The profile view of the antenna and tower, and relevant elevations are provided in Exhibit B.

While no physical construction is proposed, and therefore no FAA Obstruction Evaluation is required, an FAA Form 7460-1 is included as Exhibit C for the purpose of Electromagnetic Compatibility co-ordination.

The polar plot of the proposed directional pattern is provided as Exhibit D-1. The tabulation of same is provided as Exhibit D-2. As no vertically-polarized radiation is proposed, there is no horizontal pattern for the vertical component.

Exhibit E is a map showing the proposed Service Contours, and the population and area served.

The Allocation Study is included as Exhibit F.

Exhibit G, the Minor Change Showing, compares the before and after 60 dBu contours and service areas, demonstrating that the "change area" is less than 50%.

EXHIBIT A

ENGINEERING STATEMENT

(CONTINUED)

Consideration of other nearby RF services is provided in Exhibit H.

The instant proposal will contribute less than 1% of the site total, negating the need for ANSI RF Exposure Evaluation.

The instant proposal is believed to comply with all applicable FCC Rules.

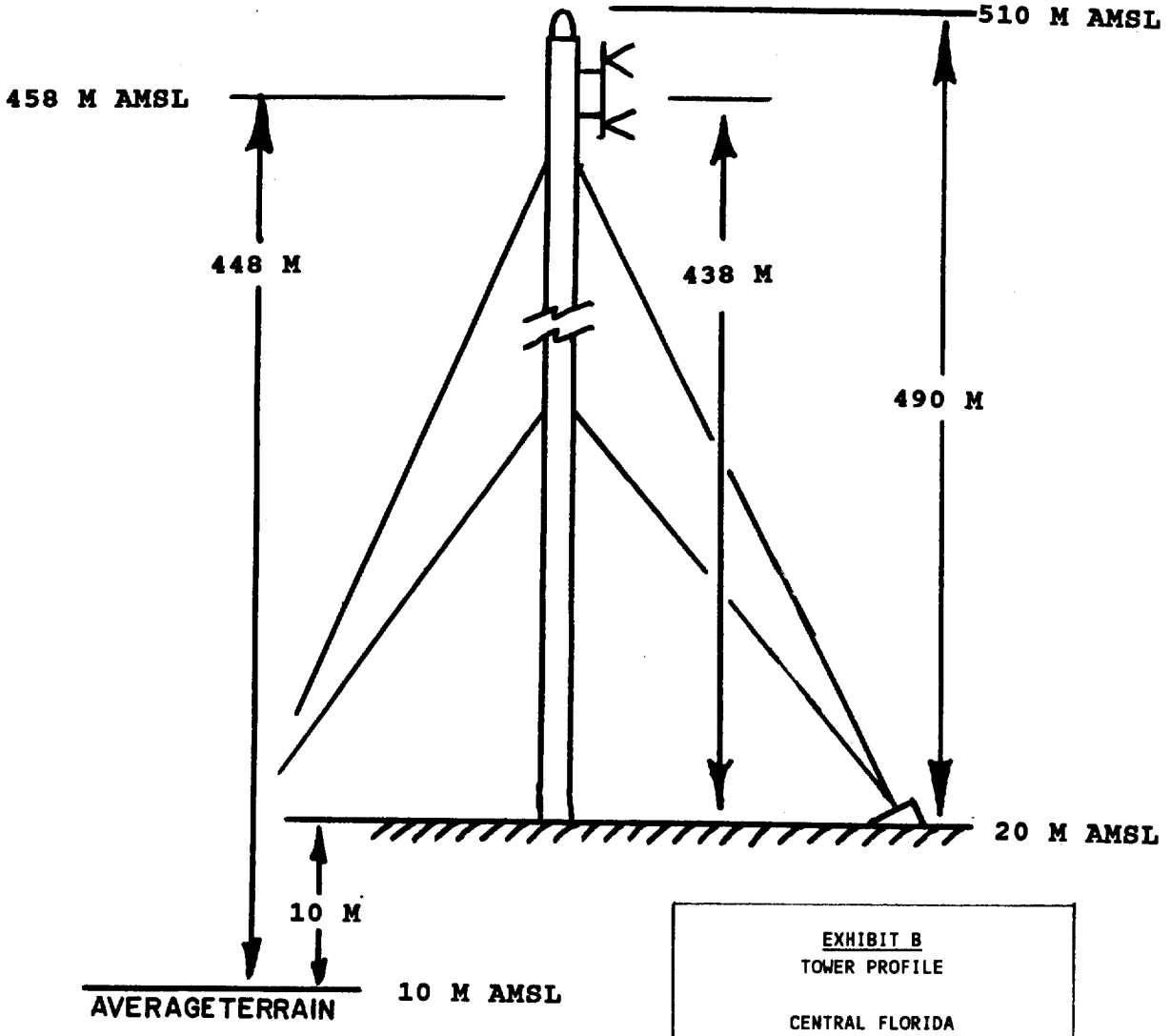
The attached work was prepared by Glen Clark, or under my immediate supervision. I am a registered Professional Engineer in the State of Georgia. This work is true and correct to the best of my knowledge and belief.

July 24, 1990

Glen Clark, P.E.

(404) 740-0178

NOT TO SCALE



PROPOSED SERVICE WILL BE DIPLEXED ONTO EXISTING WCPX(TX), RCA MODEL TBF-6AM, DIRECTIONAL, "BUTTERFLY PANEL" ANTENNA.

EXHIBIT B
TOWER PROFILE

CENTRAL FLORIDA
EDUCATIONAL FOUNDATION INC.

PROPOSED CH 202C2
0.95 KW @ 448 M AAT
UNION PARK, FL

JULY 1990

GLEN CLARK & ASSOCIATES
ATLANTA, GA

DO NOT REMOVE CARBONS

Form Approved OMB No. 2120-0001

U.S. Department of Transportation
Federal Aviation Administration

NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

Aeronautical Study Number

1. Nature of Proposal

A. Type	B. Class	C. Work Schedule Dates
☐ New Construction	☒ Permanent	Beginning FCC grant
☒ Alteration	☐ Temporary (Duration _____ months)	End 180 days after / 180 days thereafter

3A. Name and address of individual, company, corporation, etc. proposing the construction or alteration. *(Number, Street, City, State and Zip Code)*

(404) 740-0178
area code Telephone Number

Central Florida Education Foundation, Inc.
c/o Glen Clark & Associates
1150 Alpha Drive
Suite 150
Alpharetta, GA 30201-7168

B. Name, address and telephone number of proponent's representative if different than 3 above.

2. Complete Description of Structure

A. Include effective radiated power and assigned frequency of all existing, proposed or modified AM, FM, or TV broadcast stations utilizing this structure.

B. Include size and configuration of power transmission lines and their supporting towers in the vicinity of FAA facilities and public airports.

C. Include information showing site orientation, dimensions, and construction materials of the proposed structure.

No physical change in structure is proposed. This application is for the purpose of Electromagnetic Compatibility co-ordination only.

It is proposed to transmit from the existing Channel 6 (WCPX-TV) tower with 950 watts on 88.3 MHz. The center of radiation will be 1437 feet AG.

(If more space is required, continue on a separate sheet.)

4. Location of Structure

A. Coordinates *(To nearest second)*	B. Nearest City or Town, and State	C. Name of nearest airport, heliport, flightpark, or seaplane base
28 ° 36 ' 08 " Latitude	Bithlo	(1) Distance from structure to nearest point of nearest runway: Miles
81 ° 05 ' 37 " Longitude		(2) Direction from structure to airport

5. Height and Elevation *(Complete to the nearest foot)*

A. Elevation of site above mean sea level	66
B. Height of Structure including all appurtenances and lighting *(if any)* above ground, or water if so situated	1608
C. Overall height above mean sea level *(A + B)*	1674

D. Description of location of site with respect to highways, streets, airports, prominent terrain features, existing structures, etc. Attach a U.S. Geological Survey quadrangle map or equivalent showing the relationship of construction site to nearest airport(s). *(If more space is required, continue on a separate sheet of paper and attach to this notice.)*

0.45 miles North of State Route 420 at Lake Picket (Bithlo tower).

Notice is required by Part 77 of the Federal Aviation Regulations (14 C.F.R. Part 77) pursuant to Section 1101 of the Federal Aviation Act of 1958, as amended (49 U.S.C. 1101). Persons who knowingly and willingly violate the Notice requirements of Part 77 are subject to a fine (criminal penalty) of not more than $500 for the first offense and not more than $2,000 for subsequent offenses, pursuant to Section 902(a) of the Federal Aviation Act of 1958, as amended (49 U.S.C. 1472(a)).

I HEREBY CERTIFY that all of the above statements made by me are true, complete, and correct to the best of my knowledge. In addition, I agree to obstruction mark and/or light the structure in accordance with established marking & lighting standards if necessary.

Date	Typed Name/Title of Person Filing Notice	Signature
24 JUL 90	Glen Clark, Consulting Engineer	

FOR FAA USE ONLY — ***FAA will either return this form or issue a separate acknowledgement.***

The Proposal:

- ☐ Does not require a notice to FAA.
- ☐ Is not identified as an obstruction under any standard of FAR, Part 77, Subpart C, and would not be a hazard to air navigation.
- ☐ Is identified as an obstruction under the standards of FAR, Part 77, Subpart C, but would not be a hazard to air navigation.
- ☐ Should be obstruction ☐ marked, ☐ lighted per FAA Advisory Circular 70/7460-1, Chapter(s) _____
- ☐ Obstruction marking and lighting are not necessary.

Remarks:

Supplemental Notice of Construction FAA Form 7460-

- ☐ At least 48 hours before the start of construction
- ☐ Within five days after the construction reaches it

This determination expires on _____

(a) extended, revised or terminated by the issuing o
(b) the construction is subject to the licensing autho application for a construction permit is made to case the determination expires on the date pres the date the FCC denies the application.

NOTE: Request for extension of the effective period o the issuing office at least 15 days prior to the e

If the structure is subject to the licensing authority of t Agency.

or

unless:

and an
In such
n, or on

vered to

t to that

EXHIBIT C
FAA FORM 7460-1

CENTRAL FLORIDA
EDUCATIONAL FOUNDATION INC.

PROPOSED CH 202C2
0.95 KW @ 448 M AAT
UNION PARK, FL

JULY 1990

GLEN CLARK & ASSOCIATES
ATLANTA, GA

Issued In	Signature	Date

FAA Form 7460-1 (4-83) SUPERSEDES PREVIOUS EDITION

DO NOT REMOVE CARBONS

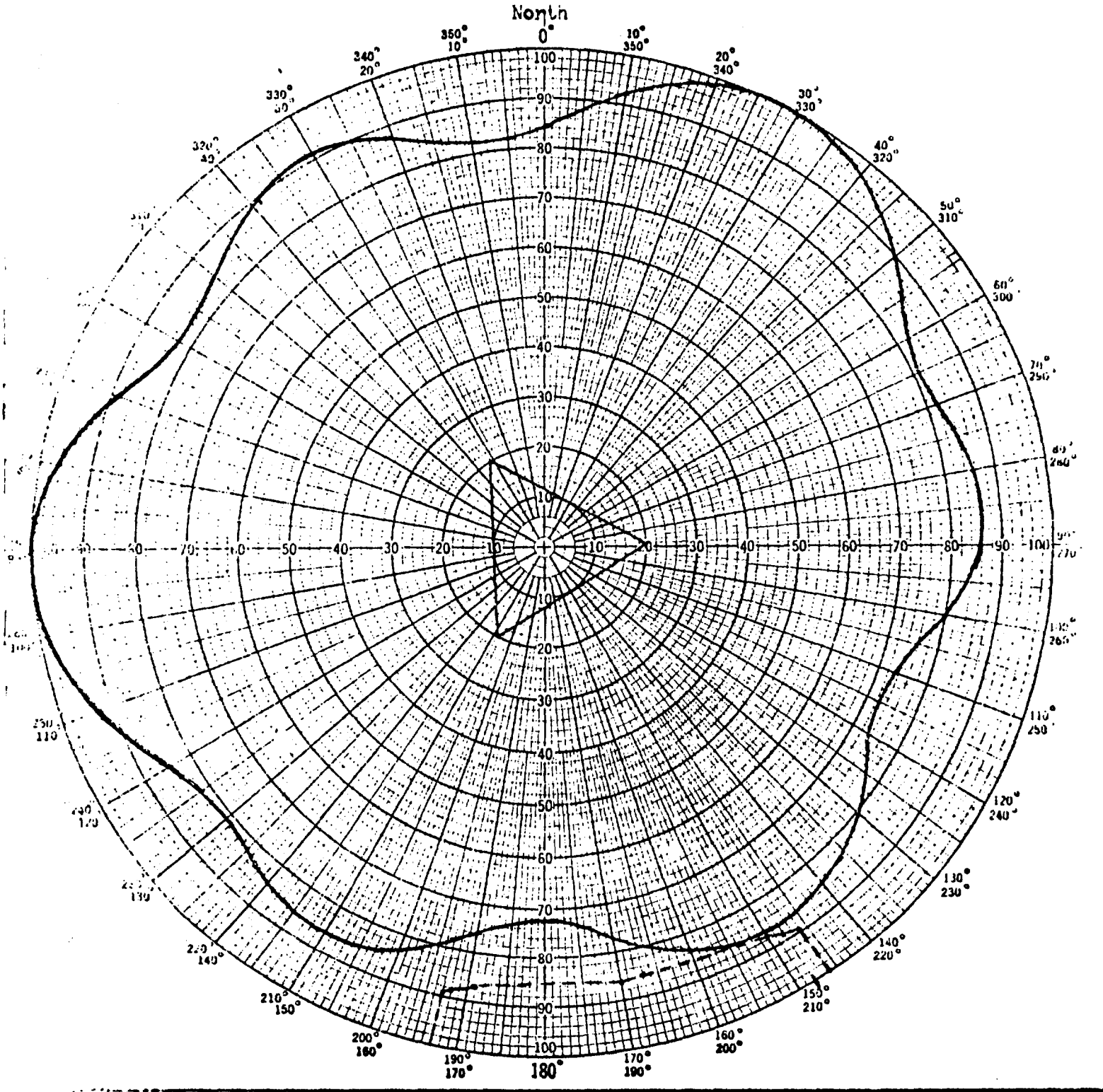


EXHIBIT D-1 POLAR PLOT OF DIRECTIONAL PATTERN CENTRAL FLORIDA EDUCATIONAL FOUNDATION INC. PROPOSED CH 202C2 0.95 KW @ 448 M AAT UNION PARK, FL JULY 1990 GLEN CLARK & ASSOCIATES ATLANTA, GA	—————— —————— — — — — —————— —————— —————— —————— ——————

FIGURE 1
RELATIVE FIELD PATTERN
APPLICATION FOR CONSTRUCTION PERMIT
TO MAKE MINOR CHANGE IN
DIRECTIONAL RADIATION PATTERN

THE OUTLET COMPANY
WDBO-TV 100 KW-DA, 1465 FT. CH. 6
ORLANDO, FLORIDA

Prepared by
Lohnes and Culver Washington, D. C.
August, 1970

EXHIBIT D-2
TABULATION OF FIELDS OF DIRECTIONAL ANTENNA
FOR RCA MODEL TBF-6AM "BUTTERFLY PANEL"

CENTRAL FLORIDA EDUCATIONAL FOUNDATION INC.
PROPOSED CH202C2, 950 WATTS AT 448 M AAT
JULY 1990

AZIMUTH DEG. TRUE	RELATIVE FIELD	ERP (*) KW.
0	0.840	0.670
10	0.920	0.804
20	0.980	0.912
30	1.000	0.950
40	0.975	0.902
50	0.900	0.765
60	0.825	0.646
70	0.820	0.639
80	0.855	0.695
90	0.855	0.695
100	0.800	0.608
110	0.735	0.513
120	0.735	0.513
130	0.805	0.616
140	0.850	0.687
150	0.865	0.711
160	0.835	0.662
170	0.770	0.563
180	0.720	0.493
190	0.760	0.548
200	0.835	0.662
210	0.860	0.703
220	0.845	0.679
230	0.820	0.639
240	0.850	0.687
250	0.935	0.831
260	0.980	0.912
270	1.000	0.950
280	0.965	0.885
290	0.885	0.744
300	0.830	0.654
310	0.845	0.679
320	0.890	0.752
330	0.910	0.787
340	0.870	0.719
350	0.820	0.639
Other relevant azimuths:		
45	0.935	0.831
135	0.830	0.654
225	0.825	0.646
315	0.870	0.719

* A relative E-field of 1.000 corresponds to 0.950 kW ERP.

Pattern presented in its true geographic orientation.
There is no "rotational offset".

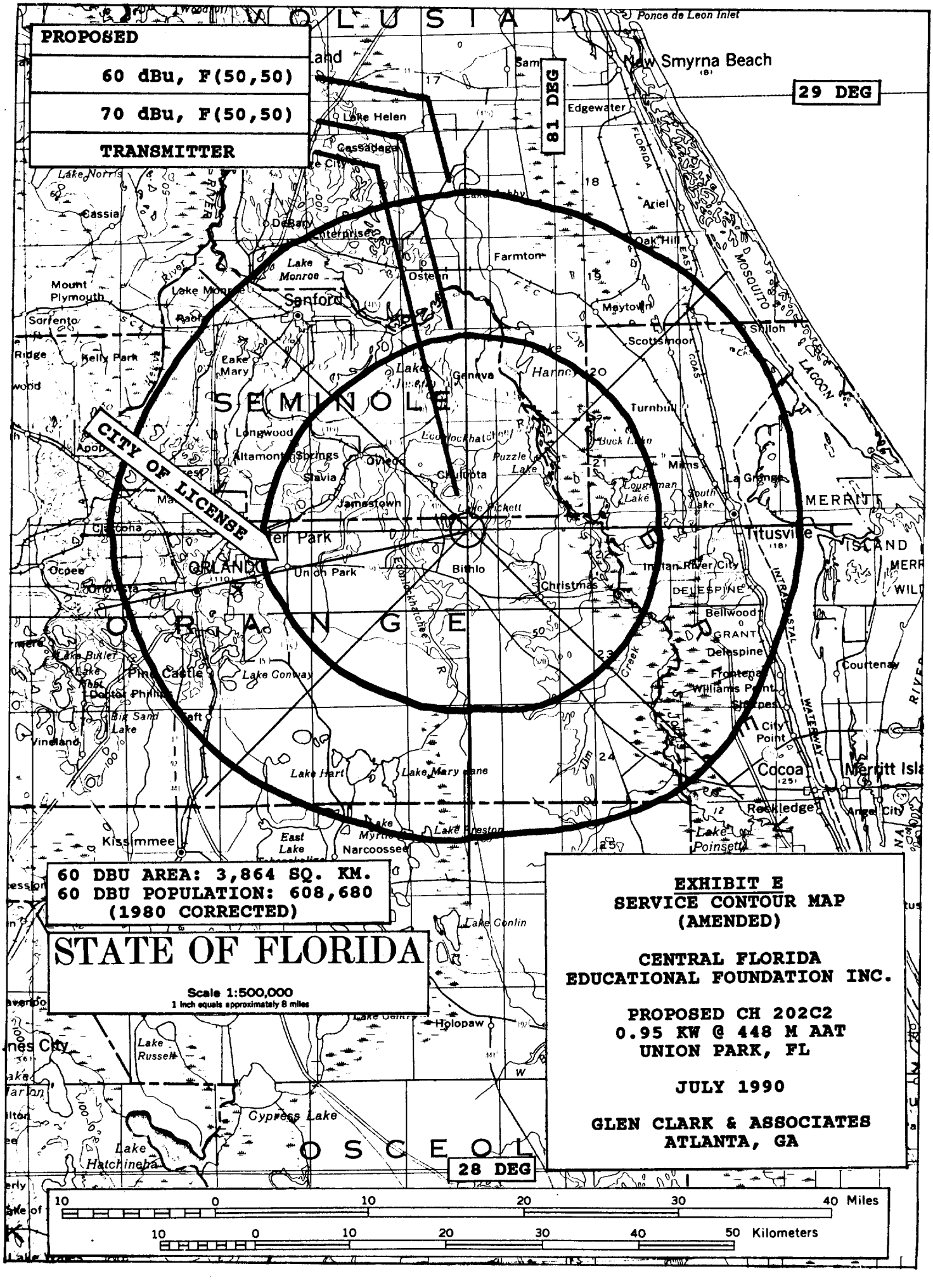


EXHIBIT E
SERVICE CONTOUR MAP
(AMENDED)

CENTRAL FLORIDA
EDUCATIONAL FOUNDATION INC.

PROPOSED CH 202C2
0.95 KW @ 448 M AAT
UNION PARK, FL

JULY 1990

GLEN CLARK & ASSOCIATES
ATLANTA, GA

```
**************************************************
*              PROGRAM FMSRCH                    *
*    COPYRIGHT 1986 AND 1989 BY GLEN CLARK       *
*          VERSION 1.2  -  29 MAY 89             *
**************************************************
```

STUDY NAME - UNION PARK

SEARCHED FROM CHANNEL 202 TO CHANNEL 202.
CLASS OF CHANNEL STUDY: C2
THE BUFFER DISTANCE IS - 60.00 KM.
CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 28 36 8 North Latitude
81 5 37 West Longitude

CITY/STATE/COUNTRY			CALL	CHANNEL	STATUS	POWER	TD	HEIGHT	LATITUDE	LONGITUDE	FILE #	DOCKET	AZIMUTH	DIST	REQ	BUFFER
CHANNEL 202																
Oak Hill	FL	US	NEW	202C1	FM APP	0.00	NN	0	28 44 21	80 53 1	B91127MD		53.3	25.53	224.0	-198.5
Union Park	FL	US	NEW	202C2	FM APP	1.90	NN	183	28 36 8	81 5 37	BPED881207MA		318.7	0.00	190.0	-190.0
Conway	FL	US	NEW	202C3	FM APP	1.90	NN	300	28 34 51	81 4 32	B91127MC		143.4	2.96	177.0	-174.0
Conway	FL	US	NEW	202C3	FM APP	1.90	NN	300	28 34 51	81 4 32	B90412MJ		143.4	2.96	177.0	-174.0
Lake Mary	FL	US	NEW	202C3	FM APP	1.90	NN	306	28 34 51	81 4 32	B91128ME		143.4	2.96	177.0	-174.0
Mims	FL	US	NEW	203A	FM APP	0.50	NN	61	28 44 21	80 53 1	B91127MB		53.3	25.53	106.0	-80.5
Palm Bay	FL	US	NEW	203A	FM APP	0.00	NY	0	28 2 54	80 40 34	BMPED891101MA		146.3	73.78	106.0	-32.2
Lecanto	FL	US	NEW	203A	FM APP	3.80	NN	79	28 52 55	82 31 30	B90523MG		282.9	143.22	166.0	-22.8
Tampa	FL	US	WMNF	203C1	FM LIC	70.00	NN	158	27 49 4	82 14 31	BMLED860514KC		232.5	142.36	158.0	-15.6
Starke	FL	US	WTLG	202C2	FM LIC	7.00	NN	87	29 54 34	82 6 2	BLED890302KA		326.3	174.85	190.0	-15.2
Orlando	FL	US	WEZD	255C2	FM CP MOD	38.00	NN	134	28 32 23	81 22 46	BMPH880920IG		256.1	28.81	20.0	8.8
Orlando	FL	US		255C2	FA USED	0.00	NN	0	28 33 0	81 25 30		88-386	259.9	32.93	20.0	12.9
Ocala	FL	US	WHIJ	201A	FM CP	0.00	NN	0	29 14 17	82 7 17	BPED870922MR		305.5	122.52	106.0	16.5
Bradenton	FL	US	WJIS	201C1	FM LIC	100.00	NN	121	27 7 54	82 23 39	BLED860523KB		218.3	207.27	158.0	49.3
North Palm Beach	FL	US	NEW	202A	FM CP	1.00	NN	46	26 47 58	80 4 35	BPED860603MH		153.2	223.55	166.0	57.5

STUDY COMPLETE.
15 RECORDS PRINTED.

EXHIBIT F-1
ALLOCATION SPACINGS OF INTEREST

CENTRAL FLORIDA
EDUCATIONAL FOUNDATION INC.

PROPOSED CH 202C2
0.95 KW @ 448 M AAT
UNION PARK, FL

JULY 1990

GLEN CLARK & ASSOCIATES
ATLANTA, GA

Interference contours based on FCC F(50,10) curves

Title: UNION PARK FL
Channel: 202 C/R 458.0 meters (1502.6 feet) A.M.S.L.

Latitude: 28-36-08
Longitude: 81-05-37

	Bearing (degrees)	HAAT (meters) (feet)	ERP (kiloWatts) (dBk)	54 dBu (.50 mV/m) contour	40 dBu (.10 mV/m) contour
	.0	450.8	.670	53.6 km	95.4 km
		1479.0	-1.74	33.3 mi	59.3 mi
	45.0	455.4	.831	56.4 km	99.0 km
		1494.1	-.80	35.0 mi	61.5 mi
	90.0	455.3	.694	54.3 km	96.4 km
		1493.8	-1.59	33.7 mi	59.9 mi
	135.0	446.3	.655	53.0 km	94.7 km
		1464.2	-1.84	33.0 mi	58.8 mi
	180.0	443.1	.492	49.6 km	90.4 km
		1453.7	-3.08	30.8 mi	56.2 mi
	225.0	442.1	.647	52.6 km	94.1 km
		1450.5	-1.89	32.7 mi	58.4 mi
*	260.0	444.1	.912	56.7 km	99.2 km
		1457.0	-.40	35.2 mi	61.6 mi
	270.0	444.5	.950	57.2 km	99.9 km
		1458.3	-.22	35.6 mi	62.0 mi
	315.0	448.6	.719	54.3 km	96.2 km
		1471.8	-1.43	33.7 mi	59.8 mi
	HAAT:	448.3			
		1470.7			

Note: Radial(s) denoted by "*" not included in HAAT calculation.

Service contours based on FCC F(50,50) curves

Title: UNION PARK FL
Channel: 202 C/R 458.0 meters (1502.6 feet) A.M.S.L.

Latitude: 28-36-08
Longitude: 81-05-37

	Bearing (degrees)	HAAT (meters) (feet)	ERP (kiloWatts) (dBk)	70 dBu (3.16 mV/m) contour	60 dBu (1 mV/m) contour
	.0	450.8	.670	19.9 km	34.9 km
		1479.0	-1.74	12.3 mi	21.7 mi
	45.0	455.4	.831	21.0 km	36.8 km
		1494.1	-.80	13.1 mi	22.9 mi
	90.0	455.3	.694	20.1 km	35.3 km
		1493.8	-1.59	12.5 mi	21.9 mi
	135.0	446.3	.655	19.6 km	34.5 km
		1464.2	-1.84	12.2 mi	21.4 mi
	180.0	443.1	.492	18.2 km	32.0 km
		1453.7	-3.08	11.3 mi	19.9 mi
	225.0	442.1	.647	19.5 km	34.2 km
		1450.5	-1.89	12.1 mi	21.3 mi
*	260.0	444.1	.912	21.3 km	37.1 km
		1457.0	-.40	13.2 mi	23.0 mi
	270.0	444.5	.950	21.5 km	37.4 km
		1458.3	-.22	13.4 mi	23.3 mi
	315.0	448.6	.719	20.2 km	35.3 km
		1471.8	-1.43	12.5 mi	22.0 mi
	HAAT:	448.3			
		1470.7			

Note: Radial(s) denoted by "*" not included in HAAT calculation.

```
**************************************************
*          PROGRAM FMWITHIN                      *
*     COPYRIGHT 1986 AND 1989 BY GLEN CLARK      *
*          VERSION 1.7  - 15 DEC 89              *
**************************************************

STUDY NAME - UNION PARK

SEARCHED FROM CHANNEL 203 TO CHANNEL 300.
THE MAXIMUM DISTANCE OF INTEREST IS -   10.00 KM.
CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES:  28 36  8 North Latitude
                         81  5 37 West Longitude
```

CITY/STATE/COUNTRY			CALL	CHANNEL	STATUS	POWER	TD	HEIGHT	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #	RECORD #
Orlando	FL	US	WMFEFM	214C1	FM LIC	100.00	NN	223	0.00	270.0	28 36 8	81 5 37	BLED800723AE	1905
Orlando	FL	US	WWKA	222C	FM LIC	100.00	YN	408	0.00	270.0	28 36 8	81 5 37	BLH840405BI	3774
Orlando	FL	US	WHTQ	243C	FM LIC	100.00	NN	487	2.96	143.3	28 34 51	81 4 32	BLH850513KL	8077
Orlando	FL	US	WDIZ	262C	FM LIC	100.00	NN	362	0.00	270.0	28 36 8	81 5 37	BLH871209KE	11887
Cocoa Beach	FL	US	WSTF	266C	FM LIC	100.00	NN	487	2.96	143.3	28 34 51	81 4 32	BLH850528KL	12717
Cocoa Beach	FL	US	WSSP	281C	FM LIC	100.00	NN	487	2.96	143.3	28 34 51	81 4 32	BLH850508KC	15958
Orlando	FL	US	WOMXFM	286C	FM LIC	100.00	YN	399	0.71	67.0	28 36 17	81 5 13	BLH820712AI	17029

```
      STUDY COMPLETE.
 20473 RECORDS READ (INCLUDING TRANSLATORS).
    7 RECORDS PRINTED.
```

Searching from 540 kHz to 1600 kHz.

Searching within 4.0 kilometers.

28 36 8
81 5 37

Data base:
Volume number - 00727
Next Change List Number - 02369
Last Update date - 900523
Format version -

CALL	STATUS	CITY	STATE	CTRY	FREQ	TYPE	HOURS	MODE	POWER	TOWERS	LATITUDE	LONGITUDE	RMS	DIST(KM)	BEARING

File closed.
26560 records read.
0 records printed.

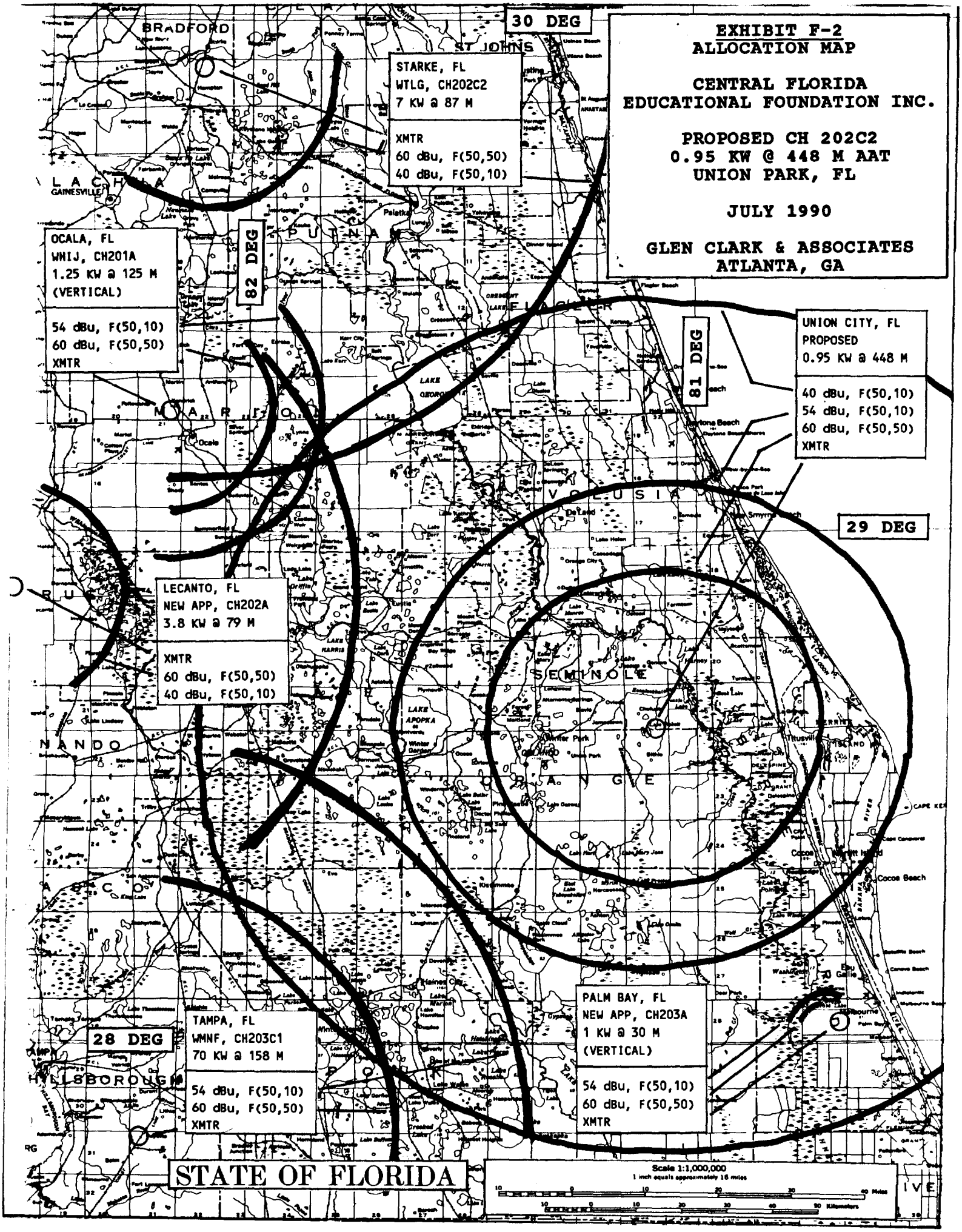
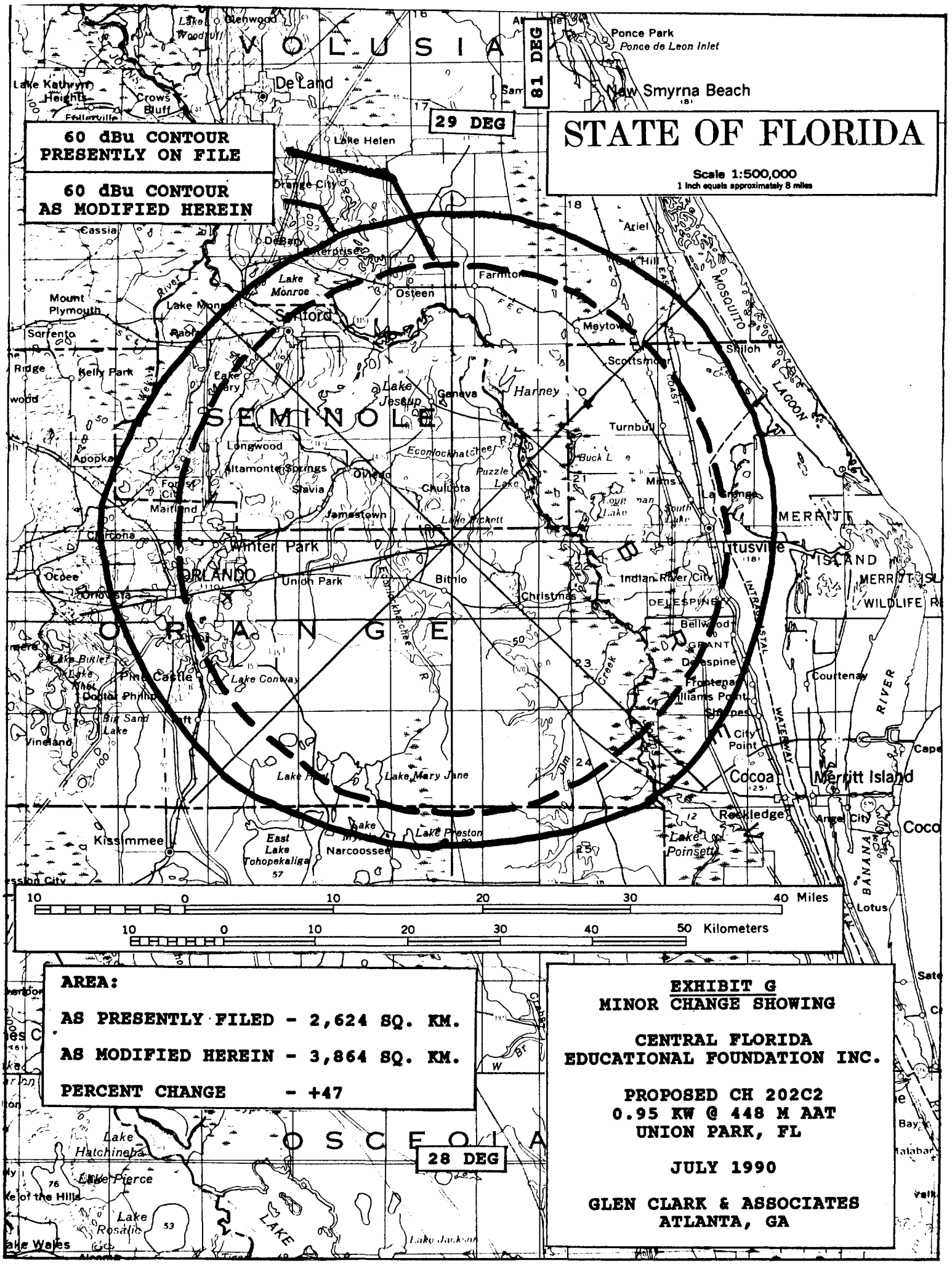


EXHIBIT F-2
ALLOCATION MAP
CENTRAL FLORIDA
EDUCATIONAL FOUNDATION INC.
PROPOSED CH 202C2
0.95 KW @ 448 M AAT
UNION PARK, FL
JULY 1990
GLEN CLARK & ASSOCIATES
ATLANTA, GA
30 DEG
STARKE, FL
WTLG, CH202C2
7 KW @ 87 M
XMTR
60 dBu, F(50,50)
40 dBu, F(50,10)
82 DEG
OCALA, FL
WHIJ, CH201A
1.25 KW @ 125 M
(VERTICAL)
54 dBu, F(50,10)
60 dBu, F(50,50)
XMTR
81 DEG
UNION CITY, FL
PROPOSED
0.95 KW @ 448 M
40 dBu, F(50,10)
54 dBu, F(50,10)
60 dBu, F(50,50)
XMTR
29 DEG
LECANTO, FL
NEW APP, CH202A
3.8 KW @ 79 M
XMTR
60 dBu, F(50,50)
40 dBu, F(50,10)
28 DEG
TAMPA, FL
WMNF, CH203C1
70 KW @ 158 M
54 dBu, F(50,10)
60 dBu, F(50,50)
XMTR
PALM BAY, FL
NEW APP, CH203A
1 KW @ 30 M
(VERTICAL)
54 dBu, F(50,10)
60 dBu, F(50,50)
XMTR
STATE OF FLORIDA
Scale 1:1,000,000
1 inch equals approximately 16 miles



AREA:

AS PRESENTLY FILED - 2,624 SQ. KM.

AS MODIFIED HEREIN - 3,864 SQ. KM.

PERCENT CHANGE - +47

EXHIBIT G
MINOR CHANGE SHOWING

CENTRAL FLORIDA EDUCATIONAL FOUNDATION INC.

PROPOSED CH 202C2
0.95 KW @ 448 M AAT
UNION PARK, FL

JULY 1990

GLEN CLARK & ASSOCIATES
ATLANTA, GA

EXHIBIT H
CONSIDERATION OF OTHER NEARBY STATIONS

CENTRAL FLORIDA EDUCATIONAL FOUNDATION INC.
PROPOSED CH202C2, 950 WATTS AT 448 M AAT
JULY 1990

In addition to the Channel 6 facility, three other FM facilities presently operate from the WCPX television tower, as shown in Exhibit F-1. They are: WMFE-FM (Ch214), WWKA(FM) (Ch222), and WDIZ(FM) (Ch262).

In addition, the following four FM stations are located within 10 kilometers of the proposed facility: WHTQ(FM) (Ch243), WSTF(FM) (Ch266), WSSP(FM) (Ch281) and WOMX-FM (Ch286).

Exhibit F-1 also shows that there are no AM authorizations within 4 kilometers of the instant proposal.

As required at Paragraph 12, Page 3, Section V-B of FCC Form 340, Applicant accepts full responsibility for elimination of objectionable interference of the type described in this section.

* * * * * * * *

Posted PAD

BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

In re Application of	)	
Central Florida Educational Foundation, Inc.	)	File No. BPED-881207MA
For Authority to Construct and Operate a New Noncommercial Educational FM Broadcast Station on 88.3 MHz at Union Park, Florida	)	

To: The Chief, FM Branch

PETITION TO DISMISS OR DENY

Florida Public Radio, Inc. (FPR), hereby petitions that the above captioned application be dismissed or denied, unless it has produced an irrevokable consent agreement from an authorized representative of TV Tower, Inc., which is the corporation that owns the tower from which the affected TV six facility transmits.

1. Central Florida Educational Foundation, Inc. (CFEF) stated in its application that it had obtained consent for constructing its proposed facility from that very tower. Interestingly, it submitted no document to verify the claim, and secondly, three other applicants for similar facilities were all told in a letter from Robert K. Diehl, Chief Engineer at TV six, that the tower ownership was denying all requests for space on the tower.

2. With several applicants competing for this portion of spectrum, it would seem reasonable that if CFEF has not made good on its claim of consent by producing a document, then its application should be denied or dismissed, and BY NO ARGUMENT, SHOULD IT BE ALLOWED TO AMEND TO AN ALTERNATE SITE.

Respectfully submitted,

Florida Public Radio, Inc.

By: _____
Randy Henry
President

Florida Public Radio, Inc.
505 Josephine St
Titusville FL 32796

CERTIFICATE OF SERVICE

I, _____ do hereby certify that I have on this 24 day of July, 1990 have sent by First Class U.S. Mail, postage prepaid, copies of the foregoing Petition to Dismiss or Deny to the following:

Central Florida Educational Foundation, Inc.
2607 S Woodland Blvd
Suite 101
Deland, FL 32720

ORIGINAL ORIGINAL

JOSEPH E. DUNNE III
COLBY M. MAY*

*ALSO ADMITTED IN VIRGINIA

MAY & DUNNE
CHARTERED
ATTORNEYS AT LAW
1000 THOMAS JEFFERSON STREET, N.W.
SUITE 520
WASHINGTON, D.C. 20007
(202) 298-6345

RICHARD G. GAY
OF COUNSEL

TELECOPIER NO.
(202) 298-6375

August 8, 1990

RECEIVED

HAND DELIVER AUG - 8 1990

Federal Communications Commission
Office of the Secretary

Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: Application of Central Florida Educational Foundation, Inc., Union Park, Florida, File No. BPED-881207MA

Dear Ms. Searcy:

Transmitted herewith on behalf of Central Florida Educational Foundation, Inc. is an original and four copies of its Opposition to the Petition to Dismiss or Deny filed by Florida Public Radio, Inc. in connection with the above referenced pending application.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

MAY & DUNNE, CHARTERED

By: Joseph E. Dunne III
Joseph E. Dunne III
Attorney for Central Florida
Educational Foundation, Inc.

JED:gmcA41
xc: James Hoge
As Per Attached Certificate of Service

RECEIVED
AUG 09 1990
FM EXAMINERS

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In Re Application Of	)	
	)	
CENTRAL FLORIDA EDUCATIONAL FOUNDATION, INC.	)	File No. BPED-881207MA
	)	
For Authority To Construct and Operate a New Noncommercial Educational FM Broadcast Station on 88.3 mHz at Union Park, Florida	)	

To: The Chief, FM Branch

OPPOSITION TO PETITION TO DISMISS OR DENY

Central Florida Educational Foundation, Inc. (Central Florida) by its undersigned attorney and pursuant to section 73.3584(b) of the Commission's rules and regulations, 47 C.F.R. § 73.3584(b) (1989), hereby respectfully submits this opposition to the Petition to Dismiss or Deny (Petition) filed against its application on July 25, 1990 by Florida Public Radio, Inc. ("FPR"). As grounds for its opposition, Central Florida shows and states as follows:

1. At the outset, FPR has utterly failed to provide sufficient facts to establish that it is a "party in interest" as required under section 309(d)(1) of the Communications Act of 1934, as amended, and thereby that it has the requisite standing to file this Petition to Dismiss or Deny against Central Florida's application. Without pleading "specific allegations of fact" which establish that Central Florida's application will cause FPR "injury in fact," and that the interest alleged to be

injured is one "arguably within the zone of interests to be protected or regulated," Association of Data Processing Services v. Camp, 397 U.S. 150 (1970), FPR has no standing to file its Petition. While Section 309(d)(1) has been interpreted to provide relief to a broad class of impacted persons, its stretch is not limitless, and does not countenance the Commission processing Petitions to Deny from parties who have no interest in the proceeding or whose interests are not effected by the application at issue. The Commission has long held that "... parties who wish to participate in Commission proceedings satisfy the minimum tests established by the courts." Telesis Corp., 68 F.C.C.2d 696, 43 R.R.2d 612, 616 (1978). Accordingly, FPR's petition is fatally flawed and should be dismissed without any further consideration.

2. Substantively, FPR's allegations are unsupported in fact or law. In sum, FPR demands that the Commission dismiss Central Florida's application because its application did not include a document which establishes its right to use the site specified.[1] There is not, however, nor has there ever been, any requirement that an applicant submit a document with its application proving that it has "reasonable assurance" for its antenna site, or even that any document exists with respect to

---

1/ Central Florida notes that it has included a document concerning the right to use the site in its July 25, 1990 amendment.